

Malcolm M. Mitchell, Jr. (VSB No. 18098)
Suparna Banerjee (VSB No. 67929)
Kara D. Lehman (VSB No. 68359)
Vorys, Sater, Seymour and Pease LLP
277 South Washington Street, Suite 310
Alexandria, VA 22314
Telephone: 703-837-6999
Facsimile: 703-549-4492
mmitchell@vorys.com

Counsel for Accent Energy California LLC

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

-----x
)
In re:)
) Chapter 11
)
CIRCUIT CITY STORES, INC., et al.,)
)
) Case No. 08-35653-KRH
Debtors.)
)
) Jointly Administered
)
-----x

**DECLARATION OF RAY HAMMAN IN SUPPORT OF MOTION BY
ACCENT ENERGY CALIFORNIA LLC FOR ADDITIONAL ADEQUATE
ASSURANCE PURSUANT TO BANKRTUPCY CODE SECTION 366
IN LIEU OF BLOCKED ACCOUNT**

I, Ray Hamman, declare as follows:

1. I am the Chief Commercial Officer of Accent Energy California LLC ("Accent Energy").
2. All facts within this Declaration are based upon personal knowledge, my review of Accent Energy business documents, correspondence and relevant documents or my opinion based upon my experience concerning the operations of Accent Energy. If called upon to testify, I would testify to the facts set forth in this Declaration.

3. I submit this Declaration in support of the *Motion by Accent Energy California LLC for Additional Adequate Assurance Pursuant to Bankruptcy Code Section 366 In Lieu of Blocked Account.*

4. It is part of my job responsibility with Accent Energy to deal with credit and bankruptcy issues concerning the accounts with Accent Energy.

5. Accent Energy provided Circuit City Stores, Inc. (the "Debtor") with pre-petition natural gas and has continued to provide the Debtor with natural gas since the petition date to the Debtor's stores on the Facility List attached as Exhibit 1 to the Motion.

6. Under Accent Energy's billing cycles, the Debtor receives approximately one month of natural gas before Accent Energy bills for such charges. It takes approximately five days to render a bill. Once a bill is rendered, the Debtor has 15 days in which to pay. If the Debtor fails to timely pay a bill, a late fee is imposed. If the Debtor fails to pay the bill, its service may be disconnected for non-payment. Under Accent Energy's billing cycles, its agreement with its supplier and the procedures required by the Bankruptcy Court, the Debtor could receive three months of unpaid charges for natural gas before Accent Energy could cease supply of natural gas for a post-petition payment default.

7. Based on historical usage and current market pricing, Accent Energy's present exposure under paragraph 6 above on the accounts under which it provides natural gas to the Debtor is estimated to be \$41,003.00.

I declare under penalty of perjury pursuant to 28 U.S.C. §1746 that the foregoing
is true and correct to the best of my knowledge, information and belief.

EXECUTED THIS 26th day of November, 2008, at Dublin, Ohio.

Raymond V Hamman
RAY HAMMAN

CITY/COUNTY OF Franklin

STATE OF OHIO

SWORN TO AND SUBSCRIBED before me in my jurisdiction aforesaid this
26th day of November 2008.

Peggy Seymour
Notary Public

My Commission expires 10-25-10.

